The Hon. David G. Estudillo 1 2 3 4 5 6 UNITED STATES DISTRICT COURT FOR THE 7 WESTERN DISTRICT OF WASHINGTON 8 AT TACOMA 9 10 UNITED STATES OF AMERICA, NO. CR23-5085-DGE 11 Plaintiff, **DECLARATION OF** AUSA JEHIEL I. BAER 12 v. IN SUPPORT OF MOTION 13 FOR A FINAL ORDER OF THOMAS CARVER, **FORFEITURE** 14 Defendant. 15 16 I, JEHIEL I. BAER, declare and sav: 17 1. I am a duly appointed Assistant United States Attorney for the Western 18 19 District of Washington, assigned to this case for the purpose of forfeiture. 2. After reviewing the relevant investigative materials, the United States 20 identified five potential claimants to the property forfeited by Defendant Thomas Carver 21 in this case: C.A.R., D.W.B., D.P.S., M.P.C., and J.R.M.. On or about January 16, 2025, 22 the United States sent direct notice, by means reasonably calculated to reach them, of the 23 pending forfeiture to these potential claimants at their last known addresses. 24 **C.A.R.** For potential claimant C.A.R., the United States sent notice 25 a. to one address, identified through a search of public records. The notice letter was never delivered nor returned to sender. Notice letters and associated delivery records, redacted

- b. **D.W.B.** For potential claimant D.W.B., the United States sent notice to one address, identified through a search of public records. The notice letter was returned to sender, marked "No Such Number" and "Unable to Forward". Notice letters and associated delivery records, redacted to preserve the privacy of the potential claimants, are attached as <u>Exhibit B</u>. The United States has no other current contact information for potential claimant D.W.B. and has used all available efforts to provide notice, by means reasonably calculated to reach potential claimant D.W.B.
- c. **D.P.S.** For potential claimant D.P.S., the United States sent notice to one address, identified through a search of public records. The notice letter was delivered on or about January 18, 2025. Notice letters and associated delivery records, redacted to preserve the privacy of the potential claimants, are attached as <u>Exhibit C</u>.
- d. **M.P.S.** For potential claimant M.P.S., the United States sent notice to one address, identified through a search of public records. The notice letter was returned to sender, marked "Unclaimed" and "Unable to Forward". Notice letters and associated delivery records, redacted to preserve the privacy of the potential claimants, are attached as <u>Exhibit D</u>. The United States has no other current contact information for potential claimant M.P.S. and has used all available efforts to provide notice, by means reasonably calculated to reach potential claimant M.P.S.
- e. **J.R.M.** For potential claimant J.R.M., the United States sent notice to two addresses, identified through a search of public records. One notice letter was returned to sender, marked "Attempted Not Known", "Moved" and "Unable to Forward." The other notice letter was delivered on or about January 25, 2025. Notice

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letters and associated delivery records, redacted to preserve the privacy of the potential 2 claimants, are attached as Exhibit E. 3 3. The United States has used all available efforts to send notice by means reasonably calculated to reach the potential claimants, as required by Rule 32.2(b)(6) of 4 5 the Federal Rules of Criminal Procedure and Supplemental Rule G(4)(b) of the Supplemental Rules for Certain Admiralty and Maritime Claims. 6 7 I declare under penalty of perjury that the foregoing is true and correct. 8 9 EXECUTED on this 16th day of April, 2025, at Seattle, Washington. 10 11 s/Jehiel I. Baer JEHIEL I. BAER 12 Assistant United States Attorney United States Attorney's Office 13 700 Stewart Street, Suite 5220 14 Seattle, WA 98101 (206) 553-2242 15 Fax: 206-553-6934 16 Jehiel.Baer@usdoj.gov 17 18 19 20 21 22 23 24 25 26 27

EXHIBIT A

U.S. Department of Justice



United States Attorney Western District of Washington

Please reply to: Jehiel I. Baer Assistant United States Attorney Information Line: (206) 553-2242

700 Stewart Street, Suite 5220 Tel: (206) 553-7970 Seattle WA, 98101-1271

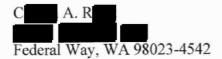
www.usdoj.gov/usao/waw

Fax: (206) 553-6934

January 16, 2025

Via U.S. Certified Mail

Tracking Number: 9589 0710 5270 0915 3782 77



Notice of Property Preliminarily Forfeited in RE: United States v. Thomas Carver, Case No. CR23-5085-DGE United States District Court for the Western District of Washington

Dear C A. R

This letter is to notify you that the property identified in the enclosed Preliminary Order of Forfeiture, which was entered in the above-captioned federal prosecution, is subject to forfeiture to the United States. We are sending you this notice pursuant to Federal Rule of Criminal Procedure 32.2(b)(6) and Title 21, United States Code, Section 853(n)(1).

Before this property is finally forfeited, the Court will adjudicate any third-party petitions that are filed claiming an interest in it. The recognized bases for stating an interest in criminally forfeitable property are outlined at 21 U.S.C. §§ 853(n)(6)(A) & (B).

If you believe you have such an interest in this property and want to contest the final forfeiture, you must file a petition within 30 days of receiving this letter. See 21 U.S.C. § 853(n)(2). Your petition must be signed under penalty of perjury, must state the nature and extent of your interest in property (including the time and circumstances under which you acquired your interest and any additional facts to support it), and must be filed with the Court. See 21 U.S.C. §§ 853(n)(2) & (3). We also recommend you reference the case title and number in your petition.

You can file your petition by sending it to:

Clerk's Office, United States District Court, Western District of Washington, 1717 Pacific Avenue, Room 3100, Tacoma, WA 98402 (Telephone: (253) 882-3800).

If you do file a petition, please also send a copy to me at the above address. Thank you.

Sincerely,

TESSA M. GORMAN United States Attorney

s/Jehiel I. Baer

JEHIEL I. BAER

Assistant United States Attorney

JB/hw Enclosure



USPS Tracking®

FAQs >

Tracking Number: Remove X

9589071052700915378277

Copy Add to Informed Delivery (https://informeddelivery.usps.com/)

Latest Update

Your package is moving within the USPS network and is on track to be delivered to its final destination. It is currently in transit to the next facility.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Out for Delivery

Preparing for Delivery

Moving Through Network

In Transit to Next Facility

January 25, 2025

Arrived at USPS Regional Facility

SEATTLE WA DISTRIBUTION CENTER January 19, 2025, 12:18 pm

Departed USPS Regional Facility

SEATTLE WA DISTRIBUTION CENTER January 17, 2025, 7:48 am

Arrived at USPS Regional Facility

SEATTLE WA DISTRIBUTION CENTER January 16, 2025, 10:09 pm Feedback

EXHIBIT B

Document 1248

Filed 04/16/25 Page 9 of 34

U.S. Department of Justice



United States Attorney Western District of Washington

Please reply to: Jehiel I. Baer Assistant United States Attorney Information Line: (206) 553-2242

700 Stewart Street, Suite 5220 Tel: (206) 553-7970 Seattle WA, 98101-1271 www.usdoj.gov/usao/waw

Fax: (206) 553-6934

January 16, 2025

Via U.S. Certified Mail

Tracking Number: 9589 0710 5270 0915 3782 60



Notice of Property Preliminarily Forfeited in RE:

United States v. Thomas Carver, Case No. CR23-5085-DGE

United States District Court for the Western District of Washington

Dear D W. B

This letter is to notify you that the property identified in the enclosed Preliminary Order of Forfeiture, which was entered in the above-captioned federal prosecution, is subject to forfeiture to the United States. We are sending you this notice pursuant to Federal Rule of Criminal Procedure 32.2(b)(6) and Title 21, United States Code, Section 853(n)(1).

Before this property is finally forfeited, the Court will adjudicate any third-party petitions that are filed claiming an interest in it. The recognized bases for stating an interest in criminally forfeitable property are outlined at 21 U.S.C. §§ 853(n)(6)(A) & (B).

If you believe you have such an interest in this property and want to contest the final forfeiture, you must file a petition within 30 days of receiving this letter. See 21 U.S.C. § 853(n)(2). Your petition must be signed under penalty of perjury, must state the nature and extent of your interest in property (including the time and circumstances under which you acquired your interest and any additional facts to support it), and must be filed with the Court. See 21 U.S.C. §§ 853(n)(2) & (3). We also recommend you reference the case title and number in your petition.

You can file your petition by sending it to:

Clerk's Office, United States District Court, Western District of Washington, 1717 Pacific Avenue, Room 3100, Tacoma, WA 98402

(Telephone: (253) 882-3800).

If you do file a petition, please also send a copy to me at the above address. Thank you.

Sincerely,

TESSA M. GORMAN United States Attorney

s/Jehiel I. Baer

JEHIEL I. BAER

Assistant United States Attorney

JB/hw Enclosure



USPS Tracking®

FAQs >

Tracking Number: Remove X

9589071052700915378260

Copy Add to Informed Delivery (https://informeddelivery.usps.com/)

Latest Update

Your item was returned to the sender on January 18, 2025 at 9:46 am in PUYALLUP, WA 98372 because of an incorrect address.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Alert

No Such Number

PUYALLUP, WA 98372 January 18, 2025, 9:46 am

Departed USPS Regional Facility

TACOMA WA DISTRIBUTION CENTER January 17, 2025, 10:36 am

Arrived at USPS Regional Facility

TACOMA WA DISTRIBUTION CENTER January 17, 2025, 4:59 am

Arrived at USPS Regional Facility

SEATTLE WA DISTRIBUTION CENTER January 16, 2025, 10:23 pm

Hide Tracking History

-eedbacl

U.S. Department of Justice

United States Attorney's Office Western District of Washington

700 Stewart Street, Suite 5220 Seattle, Washington 98101-1271

Official Business Penalty for Private Use \$300



JAN 27 2025

UNITED STATES ATTORNEY SEATTLE, WASHINGTON





0001/24/25

Edgewood, WA 98372-9713

NIXTE

EXHIBIT C

U.S. Department of Justice



United States Attorney Western District of Washington

Please reply to: Jehiel I. Baer Assistant United States Attorney Information Line: (206) 553-2242

700 Stewart Street, Suite 5220 Tel: (206) 553-7970 Seattle WA, 98101-1271

www.usdoj.gov/usao/waw

Fax: (206) 553-6934

January 16, 2025

Via U.S. Certified Mail

Tracking Number: 9589 0710 5270 0915 3782 53

P. S Kettle Falls, WA 99141-9582

> Notice of Property Preliminarily Forfeited in RE: United States v. Thomas Carver, Case No. CR23-5085-DGE United States District Court for the Western District of Washington

Dear D

This letter is to notify you that the property identified in the enclosed Preliminary Order of Forfeiture, which was entered in the above-captioned federal prosecution, is subject to forfeiture to the United States. We are sending you this notice pursuant to Federal Rule of Criminal Procedure 32.2(b)(6) and Title 21, United States Code, Section 853(n)(1).

Before this property is finally forfeited, the Court will adjudicate any third-party petitions that are filed claiming an interest in it. The recognized bases for stating an interest in criminally forfeitable property are outlined at 21 U.S.C. §§ 853(n)(6)(A) & (B).

If you believe you have such an interest in this property and want to contest the final forfeiture, you must file a petition within 30 days of receiving this letter. See 21 U.S.C. § 853(n)(2). Your petition must be signed under penalty of perjury, must state the nature and extent of your interest in property (including the time and circumstances under which you acquired your interest and any additional facts to support it), and must be filed with the Court. See 21 U.S.C. §§ 853(n)(2) & (3). We also recommend you reference the case title and number in your petition.

You can file your petition by sending it to:

Clerk's Office, United States District Court, Western District of Washington, 1717 Pacific Avenue, Room 3100, Tacoma, WA 98402

(Telephone: (253) 882-3800).

If you do file a petition, please also send a copy to me at the above address. Thank you.

Sincerely,

TESSA M. GORMAN United States Attorney

s/Jehiel I. Baer

JEHIEL I. BAER

Assistant United States Attorney

JB/hw Enclosure

F 2	U.S. Postal Service™ CERTIFIED MAIL® RECE	-ID-
5 3782	For delivery information, visit our website at	
5270 091	\$ 7.92 Extra Services & Fees (check box, add fee as appropriate) Return Receipt (hardcopy) \$ Return Receipt (electronic) \$ Certifled Mail Restricted Delivery \$ Adult Signature Required \$ Adult Signature Restricted Delivery \$	Postmark Here
07.70	D. P. S	L
9589	Kettle Falls, WA 991	, 41-9582
E	PS Form 3800, January 2023 PSN 7530-02-000-9047 See	Reverse for Instructions

ALERT: WINTER STORMS IN THE SOUTHERN, SOUTHEAST, AND NORTHEAST AND WILDFIRE...

USPS Tracking®

FAQs >

Tracking Number:

Remove X

9589071052700915378253

Copy Add to Informed Delivery (https://informeddelivery.usps.com/)

Latest Update

Your item was delivered to an individual at the address at 2:23 pm on January 18, 2025 in KETTLE FALLS, WA 99141.

=eedbac

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, Left with Individual

KETTLE FALLS, WA 99141 January 18, 2025, 2:23 pm

Departed USPS Regional Facility

SPOKANE WA DISTRIBUTION CENTER January 17, 2025, 6:08 pm

Arrived at USPS Regional Facility

SPOKANE WA DISTRIBUTION CENTER January 17, 2025, 9:38 am

Departed USPS Regional Facility

SEATTLE WA DISTRIBUTION CENTER January 17, 2025, 7:48 am

Arrived at USPS Regional Facility

SEATTLE WA DISTRIBUTION CENTER

Need More Help?

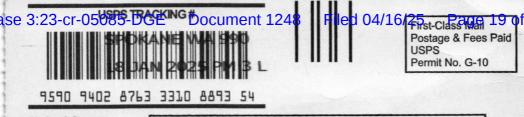
Contact USPS Tracking support for further assistance.

FAQs

SENDER: COMPLETE THIS SECTION CUMENT	LadmpletiFithesisectionอีดมีอัยเทศสัญอ 18 of	
 Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	☐ Agent ☐ Addressee C. Date of Delivery	
Description P. S. Kettle Falls, WA 99141-9582	D. Is delivery address different from item 1?	
9590 9402 8763 3310 8893 54 2. Article Number (Transfer from service label)	3. Service Type	
9589 0710 5270 0915 3782 53	Insured Mail Restricted Delivery (over \$500)	
PS Form 3811, July 2020 PSN 7530-02-000-9053	Domestic Return Receipt	

and the

To Manual



United States
Postal Service

* Sender: Please print your name, address, and ZIP+4* in this box*

United States Attorney's Office
Attn: Asset Forfeiture Division
700 Steward St., Ste. 5220
Seattle, Washington, 98101-1271



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EXHIBIT D

U.S. Department of Justice



United States Attorney Western District of Washington

Please reply to: Jehiel I. Baer Assistant United States Attorney Information Line: (206) 553-2242

700 Stewart Street, Suite 5220 Tel: (206) 553-7970 Seattle WA. 98101-1271

www.usdoj.gov/usao/waw

Fax: (206) 553-6934

January 16, 2025

Via U.S. Certified Mail

Tracking Number: 9589 0710 5270 0915 3782 46



RE: Notice of Property Preliminarily Forfeited in United States v. Thomas Carver, Case No. CR23-5085-DGE United States District Court for the Western District of Washington

Dear M P. C

This letter is to notify you that the property identified in the enclosed Preliminary Order of Forfeiture, which was entered in the above-captioned federal prosecution, is subject to forfeiture to the United States. We are sending you this notice pursuant to Federal Rule of Criminal Procedure 32.2(b)(6) and Title 21, United States Code, Section 853(n)(1).

Before this property is finally forfeited, the Court will adjudicate any third-party petitions that are filed claiming an interest in it. The recognized bases for stating an interest in criminally forfeitable property are outlined at 21 U.S.C. §§ 853(n)(6)(A) & (B).

If you believe you have such an interest in this property and want to contest the final forfeiture, you must file a petition within 30 days of receiving this letter. See 21 U.S.C. § 853(n)(2). Your petition must be signed under penalty of perjury, must state the nature and extent of your interest in property (including the time and circumstances under which you acquired your interest and any additional facts to support it), and must be filed with the Court. See 21 U.S.C. §§ 853(n)(2) & (3). We also recommend you reference the case title and number in your petition.

You can file your petition by sending it to:

Clerk's Office, United States District Court, Western District of Washington, 1717 Pacific Avenue, Room 3100, Tacoma, WA 98402 (Telephone: (253) 882-3800).

If you do file a petition, please also send a copy to me at the above address. Thank you.

Sincerely,

TESSA M. GORMAN United States Attorney

s/Jehiel I. Baer

JEHIEL I. BAER

Assistant United States Attorney

JB/hw Enclosure



ALERT: SEVERE WEATHER IN THE MIDWEST THROUGH THE NORTHEAST U.S. AND THE SOU...

USPS Tracking®

FAQs >

Tracking Number:

Remove X

9589071052700915378246

Copy Add to Informed Delivery (https://informeddelivery.usps.com/)

Latest Update

Your item has been delivered to an agent and left with an individual at the address at 2:58 pm on February 12, 2025 in SEATTLE, WA 98101.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered to Agent
Delivered to Agent, Left with Individual

SEATTLE, WA 98101 February 12, 2025, 2:58 pm

In Transit to Next Facility

February 11, 2025

Departed USPS Regional Facility

SEATTLE WA DISTRIBUTION CENTER February 10, 2025, 7:29 am

Arrived at USPS Regional Facility

SEATTLE WA DISTRIBUTION CENTER February 9, 2025, 12:19 pm

Unclaimed/Being Returned to Sender

PUYALLUP, WA 98373 February 7, 2025, 10:25 am

Need More Help?

Contact USPS Tracking support for further assistance.

Case 3:23-cr-05085-D

CERTIFIED MAIL

age 25 of 34

0002/09/25

9589 0710 5270 0915 3782 46

Seattle, Washington 98101-1271 Official Business Penalty for Private Use \$300

U.S. Department of Justice and the contract of Justice and

United States Attorney's Office Western District of Washington 700 Stewart Street, Suite 5220

FEB 12 2025

UNITED STATES ATTORNEY SEATTLE, WASHINGTON

Puyallup WA 98371-6205

NIXIF

98371-6 98101>4439

EXHIBIT E

Document 1248

Filed 04/16/25

Page 27 of 34

U.S. Department of Justice



United States Attorney Western District of Washington

Please reply to: Jehiel I. Baer Assistant United States Attorney Information Line: (206) 553-2242

700 Stewart Street, Suite 5220 Seattle WA, 98101-1271

www.usdoj.gov/usao/waw

Tel: (206) 553-7970 Fax: (206) 553-6934

January 16, 2025

Via U.S. Certified Mail

Tracking Number: 9589 0710 5270 0915 3782 22

Madera, CA 93637-2762

Via U.S. Certified Mail

Tracking Number: 9589 0710 5270 0915 3782 39

J R. M Pensacola, FL 32514-6553

> RE: Notice of Property Preliminarily Forfeited in United States v. Thomas Carver, Case No. CR23-5085-DGE

United States District Court for the Western District of Washington

Dear J R. M

This letter is to notify you that the property identified in the enclosed Preliminary Order of Forfeiture, which was entered in the above-captioned federal prosecution, is subject to forfeiture to the United States. We are sending you this notice pursuant to Federal Rule of Criminal Procedure 32.2(b)(6) and Title 21, United States Code, Section 853(n)(1).

Before this property is finally forfeited, the Court will adjudicate any third-party petitions that are filed claiming an interest in it. The recognized bases for stating an interest in criminally forfeitable property are outlined at 21 U.S.C. §§ 853(n)(6)(A) & (B).

If you believe you have such an interest in this property and want to contest the final forfeiture, you must file a petition within 30 days of receiving this letter. See 21 U.S.C. § 853(n)(2). Your petition must be signed under penalty of perjury, must state the nature and extent of your interest in property (including the time and circumstances under which you acquired your interest and any additional facts to support it), and must be filed with the Court. See 21 U.S.C. §§ 853(n)(2) & (3). We also recommend you reference the case title and number in your petition.

You can file your petition by sending it to:

Clerk's Office, United States District Court, Western District of Washington, 1717 Pacific Avenue, Room 3100, Tacoma, WA 98402

(Telephone: (253) 882-3800).

If you do file a petition, please also send a copy to me at the above address. Thank you.

Sincerely,

TESSA M. GORMAN United States Attorney

s/Jehiel I. Baer

JEHIEL I. BAER

Assistant United States Attorney

JB/hw Enclosure





ALERT: WINTER STORMS IN THE SOUTHERN, SOUTHEAST, AND NORTHEAST AND WILDFIRE...

USPS Tracking®

FAQs >

Tracking Number:

Remove X

9589071052700915378222

Copy Add to Informed Delivery (https://informeddelivery.usps.com/)

Latest Update

Your item has been delivered to an agent at the front desk, reception, or mail room at 11:17 am on January 21, 2025 in MADERA, CA 93637.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered to Agent

Delivered to Agent, Front Desk/Reception/Mail

Room

MADERA, CA 93637 January 21, 2025, 11:17 am

In Transit to Next Facility

January 20, 2025

Arrived at USPS Regional Facility

FRESNO CA DISTRIBUTION CENTER January 18, 2025, 2:45 pm

Departed USPS Regional Facility

SEATTLE WA DISTRIBUTION CENTER January 17, 2025, 7:48 am

Arrived at USPS Regional Facility

SEATTLE WA DISTRIBUTION CENTER

Feedback

Need More Help?

Contact USPS Tracking support for further assistance.

FAQs

Case 3:23-cr-05085-D

U.S. Department of Justice United States Attorney's Office

Western District of Washington .

700 Stewart Street, Suite 5220 Seattle, Washington 98101-1271

Official Business Penalty for Private Use \$300

RECEIVED

FEB 03 2025

UNITED STATES AT RIVEY SEATTLE, WASHINGTON



5270 0915

Page 31 of 34



NIXIE

0001/25/25

Case 3:23-cr-05085-DGE Document 1248 Filed 04/16/25 Page 32 of 34

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.
 - . Article Addressed to:





- 2. Article Number (Transfer from service label)
- 9589 0710 5270 0915 3782

PS Form 3811, July 2020 PSN 7530-02-000-9053



A. Signature

Service Type

☐ Collect on Delivery

☐ Adult Signature Restricted Delivery

Certified Mail Restricted Delivery

Insured Mail Restricted Delivery (over \$500)

Collect on Delivery Restricted Delivery

☐ Adult Signature

Certified Mall®

Insured Mail

☐ Agent ☐ Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes If YES, enter delivery address below: ☐ No

> ☐ Priority Mail Express®
> ☐ Registered Mail™ ☐ Registered Mail Restricted

☐ Signature Confirmation™ ☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt





ALERT: WINTER STORMS IN THE MIDWEST THROUGH THE NORTHEAST AND WILDFIRES AN...

USPS Tracking®

FAQs >

Tracking Number:

Remove X

9589071052700915378239

Copy Add to Informed Delivery (https://informeddelivery.usps.com/)

Latest Update

Your item was delivered to an individual at the address at 10:50 am on January 25, 2025 in PENSACOLA, FL 32514.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, Left with Individual

PENSACOLA, FL 32514 January 25, 2025, 10:50 am

In Transit to Next Facility

January 24, 2025

Arrived at USPS Regional Facility

PENSACOLA FL PROCESSING CENTER January 21, 2025, 5:10 am

Departed USPS Regional Facility

SEATTLE WA DISTRIBUTION CENTER January 17, 2025, 7:48 am

Arrived at USPS Regional Facility

SEATTLE WA DISTRIBUTION CENTER January 16, 2025, 10:09 pm

